

The State of New Hampshire

DEPARTMENT OF ENVIRONMENTAL SERVICES



Drinking Water and Groundwater Bureau

Revised Total Coliform Rule

Total coliform bacteria contamination can be an indicator for the presence of illness causing contaminants in water systems, such as *E. coli* bacteria and viruses. The new Revised Total Coliform Rule (RTCR) furthers the protection of public health by ensuring the integrity of drinking water systems and monitoring for the presence of microbial contamination. The RTCR focuses on a "find and fix" approach in response to positive bacteria sampling in public water systems.

EPA requires all states to implement the RTCR by April 2016. The State of New Hampshire was the first state in the nation to implement the RTCR in February 2015.

The RTCR no longer applies a violation after confirmed positive total coliform sample results. The public notice requirement associated with a confirmed positive total coliform result has also been removed. Other main components of the law are changes in bacterial monitoring frequency for some systems and the need to perform assessments as described below.

Monitoring Requirements

Transitioning over to the requirements of the RTCR, all public water systems (except seasonal water systems) continue on the monitoring schedule that was in place in January 2015. Systems that were on reduced monitoring remained on that monitoring frequency until an event triggers an increase in monitoring. Reductions to the standard monitoring requirements listed below may be available if certain criteria are met. The detailed requirements are found in Env-Dw 709.

After a positive total coliform, you will be notified by DWGB of the additional actions needed. This will include the collection of repeat samples, which has been reduced to three repeats. In addition a groundwater source sample must be collected from each source in use at the time of the positive result and cannot be used as a bacteria repeat sample. Systems not on monthly sampling will be required to collect three additional routines the month after a positive sample.

Public Water System	Standard
Community - >1,000 people served All Surface Water PWS	Monthly
Community - <1,000 people served	Monthly
Non-Community	Quarterly
Seasonal	Monthly*

^{*} Monthly for seasonals unless 'exempt" as detailed on next page

All public water systems (PWS) should review their Master Sampling Schedule at OneStop on a regular basis and use current analysis request forms for each sampling event.

Assessments

As the basis of the "find and fix" approach, assessments will be required to evaluate the water system and address any sanitary defects. The assessments must be performed, and the report submitted to DES, within 30 days. Sanitary defects must be corrected within 30 days, or the assessment report must include a proposed schedule to correct deficiencies that require a longer time period.

Level 1 Assessments: Under certain circumstances following a positive total coliform sample, public water systems will be required to perform a Level I assessment. Some of the "triggers" for these assessments include: a repeat sample taken after a positive total coliform result is also positive, or the water system fails to take a repeat sample after a positive total coliform result. Env-Dw 709.22 identifies all the scenarios that would trigger a Level I assessment.

For non-community water systems, the Level 1 assessment may be performed by the owner. We recommend, however, that a person familiar with the water system perform the assessment. Level 1 assessments at community water systems must be performed by a certified operator of the appropriate grade.

Level 2 Assessments: These assessments will be required after an *E. coli* MCL violation or if a second Level 1 assessment is triggered in a twelve month period. DES will perform Level 2 assessments after positive *E. coli* results. The PWS will be required to have a certified operator perform the other Level 2 assessments. The operator cannot be the same person that performed the other assessment, although a team approach and/or consultation with the Level 1 assessor is recommended.

<u>Level 1</u> and <u>Level 2</u> assessment report templates are available on the RTCR or Forms pages of our website. More information on persons qualified to perform the assessments are identified in <u>Env-Dw 720.08</u>.

Seasonal water Systems

A seasonal system is defined as a "non-community water system that is not operated as a public water system on a year-round basis and starts up and shuts down at the beginning and end of each operating season" (for example, campgrounds). Seasonal systems represent a special case in that the shutdown and start-up of these water systems present additional opportunities for contamination to enter and/or spread through the distribution system. Those that do not depressurize during the "off-season" are exempt from the monthly monitoring and start-up procedures described below. Rules related to seasonal systems are included in Env-Dw 720 and Env-Dw 506.

Monthly Monitoring: For the first time, the RTCR establishes monitoring requirements specific to seasonal systems. Seasonal systems will have to monitor monthly for bacteria, starting in the month that the system opens through the month that the system closes. Seasonal water systems may request a reduction to monthly monitoring. In accordance with Env-Dw 709.12, the request must be made annually and certain criteria must be met annually. Exempt seasonal systems will have to monitor quarterly.

Start-up Procedures: Starting in January 2016, seasonal systems will be required to perform start-up procedures and certify to DES that the procedures have been followed. Until those requirements are enforced in 2016, DES recommends that seasonal systems follow the <u>start-up procedures</u> as this will help ensure clean water is being provided to the public, and will also provide an opportunity to practice the procedures until they are required in 2016.

For additional information and/or questions about the RTCR, please contact the following individuals at the Drinking Water and Groundwater Bureau:

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